REMARKS

This responds to the Non-Final Office Action mailed on February 18, 2010. Reconsideration and continued examination is respectfully requested in view of the following remarks.

Status of Claims

Claims 27-43 were pending in the instant application. In particular, claims 27-43 have been rejected based on prior art, while claims 1-26, 40 and 41 have been cancelled without prejudice or disclaimer. As such, claims 27-39, 42 and 43 are presently pending in the instant application.

§103 Rejections of the Claims

Claims 27-29, 31-36, and 38-41 have been rejected under 35 USC 103(a) as being unpatentable over Bickmore et al. (U.S. Patent No. 6,857,102) in view of Holland et al. (U.S. Patent No. 6,507,867). In addition, claims 31 and 37 have been rejected as being unpatentable over Bickmore and Holland in view of Jeffrey et al (U.S. Patent Publication No. 2002/0083090), while claims 42 and 43 have been rejected as being unpatentable over Bickmore and Holland, and further in view of Fujii et al. (U.S. Patent No. 6,285,461). The Applicant respectfully traverses the above rejections.

With respect to independent claim 27, the Examiner asserts that Bickmore discloses "…a system for converting interactive content to a form suitable for distribution to clients with a limited or non-existent return channel while preserving the interactivity of the content, the system comprising: a storage media comprising program code and a plurality of data structures, the plurality of data structures including: a page URL data structure storing data for use in identifying pages of the interactive Internet content, a page partition data structure storing data for use in tracking navigation data contained in a particular partition of a plurality of partitions….(Here, the re-authoring page is stored at a page location. The page partition data structure, or page, stores data removed from the original page and placed into the re-authored sub-page)…a partition link data structure storing data for use in tracking navigation data contained in a particular partition of a plurality of partitions…(Here, the re-authoring system constructs a parse tree. This parse tree contains unique page identifiers for navigation between

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pages)…a processor to execute the program to enable the system to select and partition a single page of the interactive Internet content into a plurality of partitions, to integrate data stored in the page URL, page partition, and partition link data structures and partitions…"[1]

Although the Examiner admits that Bickmore fails to specifically disclose "…packaging the data into a bundle, and distribution of the bundle to a client device, the Examiner contends that Holland discloses "…packaging the data into a bundle, and distribution of the bundle to a client device (…Here, each of a Page URL, Page Partition, and Partition Link are components of a web page..[t]he bundling web server obtains the referenced data pages and constructs a bundle. This bundle inherently includes a Page URL, Page Partition, and Partition Link).[2]

Independent claim 27 as presently amended recites, in part, a "system for converting interactive Internet content to a form suitable for distribution to clients with a limited or non-existent return channel while preserving the interactivity of the content, the system comprising a storage media including program code and a plurality of data structures, … and a processor to execute the program code to enable the system to select and partition a single page of the interactive Internet content into the plurality of partitions, to integrate data stored in the Page URL, Page Partition, and Partition Link data structures and partitions into a bundle, and to distribute the bundle to a client device *__having a monitor, wherein each of the plurality of partitions is displayed fully on the monitor__*"[3]

Bickmore relates to "…an automated method for re-authoring a document originally designed for display on a desktop computer screen for display on a smaller display screen…At each stage of the re-authoring, a number of different transformations are applied to the original document or a selected re-authored page…"[4] Bickmore further recites that one of the transforms used to re-author the document is an Indexed Segment transform that "…takes an input page, segments the content into a sub-pages by allocating some number of items to each, and builds and prepends an index page to the collection of sub-pages. The Indexed Segment transform then starts filling out output pages with these elements in order until each page is "full" relative to the client's display size. [However] [i]f a single logical element cannot fit on a single output page,

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[1] *See* Office Action, at pages 2 and 3
[2] *Id.*
[3] *See* Claim 27, Emphasis Added.
[4] *See* Abstract.

then the Indexed Segment transform **performs a secondary partitioning**..."[5] As such, the Bickmore re-authoring system is not capable of partitioning all types of documents such that each partition is fully displayed in its entirety during the initial partitioning of the document since the system may require secondary partitioning of the page before it can be displayed fully on the client device.

As illustrated in FIG. 1, the re-authoring system of Bickmore requires an intermediate step before the sub-page (112) may even be fully displayed on the client device. In particular, after "segmenting" the document (100) into a plurality of sections and prior to being able to display the sub-page on the client device, the "...Index Segment transform... constructs an index page by copying a section header or first sentence from each element to be output, concatenating the copied portion onto an index page and creating a hypertext link from each copied portion to the appropriate sub-page." Moreover, "...the index page itself may also need to be segmented"[6] before the individual sub-pages may be fully displayed on the client device. As such, the re-authorizing system of Bickmore is not capable of partitioning all types of documents such that each partition is fully displayed on the client device.

In the Office Action, the Examiner also refers to FIG. 12 of Bickmore as disclosing a method of partitioning a single page of the interactive Internet content into a plurality of partitions. A review of FIG. 12 and related text in the detailed description shows that the figure is in reference to an elision transform routine "...where a portion of a current page or sub-page to be removed is selected..."[7] in order to remove sufficient text from the document to make it viewable on the client device. However, the elision transform does not partition the document, but simply removes text from the document to make it viewable. Accordingly, there is no teaching or suggesting related to the elision transform that this particular transform partition the document into a plurality of partitions such that each partition is fully displayed by the client device.

In view of the above, Bickmore does not teach or suggest the claim limitation of "a processor to...select and partition a single page of the interactive Internet content into the plurality of partitions...*wherein each of the plurality of partitions is displayed fully on the monitor*" since the Bickmore system cannot partition a document into subpages for viewing on a

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[5] *See* Col. 8, lines 44-52, Emphasis Added
[6] *See* Col. 8, lines 56-62.
[7] *See* Col. 22, lines 27-31.

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client device without first constructing an index page using the Indexed Segment transform. As such, there is no teaching or suggestion that the Indexed Segment transform or any other transform, such as the elision transform, disclosed in the Bickmore reference that can partition a document into a plurality of partitions, wherein each of the plurality of partitions is fully displayed on the client device since either an index page must first be constructed before the sub-page may be viewed from the index page, or that an existing partition may require secondary or even tertiary partitioning before being fully displayed on the client device.

Similarly, Holland, Fujii and Jeffrey also fail to teach or suggest, alone or in any combination, the claim limitation of partitioning a single page into a plurality of partitions such that each of the plurality of partitions is displayed fully on the monitor, and thus these references fail to overcome the defect of Bickmore.

Moreover, dependent claims 42 and 43 have been amended to clarify the technique used to partition the document into a plurality of partitions such that each of the plurality of partitions is fully viewable by the client device. In particular, these respective dependent claims have been amended to recite that the "processor renders and creates a bitmap image of the single page of the interactive Internet content prior to partitioning of the single page ***and then divides the bitmap image of the single page into the plurality of partitions when partitioning the single page such that each of the plurality of partitions is displayed fully on the monitor***."[16] A review of Bickmore shows that the reference fails to teach or suggest such a claim limitation of dividing a bitmap image of the single page into the plurality of partitions that are each fully viewable on the client device.

Based on the foregoing, a prima facie case of obviousness cannot be established by the Examiner since the cited art does not teach or suggest every claim element of newly amended independent claim 27 or otherwise render the claim as being obvious. Accordingly, the Examiner is respectfully requested to withdraw his rejection of independent claim 27 and

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[16] *See* Claims 42 and 43.

indicate the allowance thereof. Similarly, the Examiner is respectfully requested to withdraw his rejection of independent claim 34, which has been amended to include the corresponding claim limitation of "partitioning a single page into a plurality of partitions, wherein each of the plurality of partitions is displayed fully on one screen of the monitor,"[17], and is allowable for the same reasons as independent claim 27. The Examiner is also respectfully requested to withdraw the rejections of dependent claims 28-33, 35-39, 42 and 43 by virtue of their respective dependencies from independent claims 27 and 34 and indicate the allowance thereof.

CONCLUSION

Applicant respectfully submits that the claims are in condition for allowance, and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's representative at (314) 552-6855 to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 50-1662.

Respectfully submitted,

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[17] *See* Claim 27.